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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE:

TOSHA YVETTE MOORE

Debtor(s)

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§

**Case No. 19-20140-BP-13
Chapter 13**

**MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 13 SCHEDULES,
STATEMENT OF AFFAIRS AND CHAPTER 13 PLAN**

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW Debtor, **Tosha Yvette Moore** requests an order extending the deadlines to file Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies pursuant to L.B.R. 1007.1(a) and F.R.B.P 3015 and would show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. Debtor filed her petition in bankruptcy under Chapter 13 on 9/19/2019.
3. The Chapter 13 Schedules, Statement of Affairs, and Chapter 13 Plan are due on October 3, 2019.
4. The § 341 Creditor Meeting is set for November 6, 2019.

5. Debtor will need an additional fourteen (14) days, until October 17, 2019, to prepare the Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies because of the need to gather information. Debtor's other obligations have resulted in a delay in providing her Attorney information necessary to produce accurate Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies.

WHEREFORE, PREMISES CONSIDERED, Debtor **Tosha Yvette Moore** respectfully requests the Court to grant an extension of fourteen (14) days, until October 17, 2019, for Debtor to file her Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies and for such other relief the Court may grant.

Dated: October 1, 2019

Respectfully Submitted,

LEE LAW FIRM, PLLC

By: /s/ Randy Leigh Tipton

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 1, 2019, a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

DEBTOR(S):

Tosha Yvette Moore
701 N. Cass St
Jefferson, TX 75657

STANDING CHAPTER 13 TRUSTEE:

Lloyd Kraus
Plaza Tower
110 N. College Ave, 12th Fl
Tyler, TX 75702

U.S. TRUSTEE

110 N. College Ave, Ste 300
Tyler, TX 75702

/s/ Randy Leigh Tipton

Randy Leigh Tipton
State Bar No. 24039860

ATTORNEY FOR DEBTOR(S)